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Environmental & Energy Services

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November 1, 1990

Michigan Department of Natural Resources
38980 Seven Mile Road
Livonia, Michigan 48152

Attn: Mr. Mike Stenzel

Subject: Remedial Closure Report for the property located at
13400-700 Mt. Elliott Avenue, Detroit, Michigan.

Dear Mr. Stenzel:

Following our telephone conversation of November 1, 1990, I am writing this letter to confirm in writing to you and the Michigan Department of Natural Resources the essentials of our discussion. As always I appreciate your time and the candor used in assisting us on this project.

On October 18, 1990 our client Central Steel & Wire, Company received a copy of the Remedial Closure Report for PNA Contamination of Soil issued by the Toxico Corporation, of Southfield, Michigan. The report summarizes the investigation phase as well as the remedial site activities that occurred during this closure. Please note this work was performed under the guidance of Toxico Corporation employees in response to soil contamination found during an environmental assessment of the General Die Casting Property located at 13700 Mount Elliott Avenue. Please also note that the contamination found in that investigation had permeated the ground of our client's property located immediately to the south of the General Die Casting facility. Our purpose in writing this letter is to clarify several issues presented in the Toxico report and to provide commentary from the perspective of our client.

We would like to go on record as opposing the clean closure of this site for several reasons, not the least of which is that contamination still remains on this site. We do not believe the data submitted in the final report adequately describes the situation and negative environmental impact that exists on our client's property. The levels of cyanide found in the soil and water samples collected represent a hazardous situation if not a public health hazard. It is our opinion that the Toxico Corporation would have chosen to completely ignore the issue of the cyanide contamination had we not been on site representing our

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client's interests. We hope that all appropriate action will be taken on the part of your agency to guarantee that a complete clean up of the existing cyanide contamination, and any other contamination, is accomplished as speedily as possible on our client's property.

The following is a brief discussion of the issues raised by the Toxico Report. As a general comment, we feel that the report as written is inadequate to support the claims presented, and that additional testing was performed and not included in this closure document. We are interested in reviewing this additional data as well as the Level I report that was prepared by Analytical & Biological Laboratories.

On page 2 of the introduction section of this report usage of Gabriel Laboratories data was used to confirm the nature, extent, and migration characteristics of the PNA contamination at this site. Appendix III of the report is listed as a Gabriel report dated November 10, 1989. The appendix consists of "draft" data pages prepared for our client Central Steel & Wire and does not confirm the nature, extent, and migration characteristics of the PNA contamination.

We agree with the assumption made by Toxico that the source of the PNA and other contamination on the site stems from the former plating and tool and die operation at the 13700 Mount Elliott Avenue location. The source of the contamination derives, at least in part, from fluids that accumulated between the south wall of the building and the interior overflow/cleaning tanks. The unplugged pipe extending from the building to the excavation pit must also be investigated as a possible source of contamination.

Central Steel & Wire began full operation at 13400 Mount Elliott Avenue in 1950 and had owned some of the property as early as 1944. The business consists of a warehouse and service center for steel materials. Approximately eighty percent of the water usage at the plant is used for domestic purposes, with the remainder used for boiler water consumption. Based on our clients knowledge of uses of the property going back to 1944, there is no indication that any operations on the property ever included the use of cyanide or zinc.

We will be most ready and able to discuss the issues surrounding this unfortunate situation at the meeting we have scheduled with yours and a Michigan Department of Natural Resources enforcement officer to be held on December 5, 1990 at 10:30 am. We would like to hold this meeting at a conference room at your facility if that could be arranged.